# Visual Analysis
# Proposed Borrego Solar 1 Project

Borrego Springs, California

*Prepared for:*

**SAN DIEGO COUNTY**
**DEPARTMENT OF PLANNING AND LAND USE**

**MUP 3300 10-026**
**Environmental Review Number 10-050-01**

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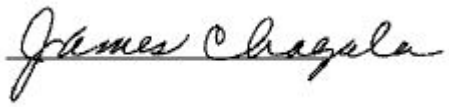

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# EXECUTIVE SUMMARY

This project is a request for a Major Use Permit to authorize the construction of a 26 or 31 Mega watt Unmanned Photovoltaic Solar Farm depending on whether a fixed or tracker array is used. It will be on a 308 acre parcel with a 69Kv Generation Transmission Line which will run from the solar farm parcel to the existing Borrego Substation. Maximum height of any structures proposed is 10 feet, with the modules measuring 7 feet in height. The project is located southwest of the intersection of Henderson Canyon and Borrego Valley Roads within the Desert Subregional Planning Area . The project will be on land that has previously been disturbed by agricultural uses and which is located in the northern part of the valley adjacent to current agricultural uses.

In the immediate vicinity the lack of elevation, the modest height of the proposed structures, and the extensive system of trees along the property boundaries limit views into the subject property. The valley floor of Borrego Springs is in the same situation as the immediate vicinity as it is very level with occasional small ridges and is similar in elevation to the subject property. This fact, along with the modest height of the development, and the extensive tree system results in very limited views of this project from the valley floor. The higher elevations going up the mountains and higher elevations on the periphery of the valley have the key views. These views are of a long distance, measuring roughly between 5 and 7 miles. Due to the area of this project and the contrasting color of the modules against the desert soils, the project will be visible, with the visibility increasing with higher elevation. However, since the project is adjacent to productive agriculture, there are already contrasting colors in the vicinity with the project blending in with this existing agriculture.

The conclusion of this analysis is that there will be no significant adverse impacts to visual character as a result of this project from either the valley floor or higher elevations and no mitigation measures are proposed. This conclusion is based upon the following findings:

From the valley floor:

- The valley floor and this project are generally level, meaning views into the property are easily obstructed by even lower height vegetation.

- The height of the structures will be a maximum of 10 feet again meaning view into the property are easily obstructed by even lower height vegetation.

- There are agricultural operations taking place adjacent to the property both to the north and east which will obstruct views from those directions.

- There is an extensive system of windrows which have developed over time in the valley. These rows of vegetation have generally been planted to protect theagricultural areas from wind erosion, but they also serve to block views into the property of lower structures.

- Views from a public road are limited to approximately .75 miles on Borrego Valley Road and approximately .16 miles on Di Giorgio Road. Both of these roads are lightly traveled and the duration of the views are short term.

- There are very limited views from S22 (on the valley floor), the third priority scenic highway per the Scenic Highway Element.

- There are no views from SR78, which is an Officially Designated Scenic Highway by the State of California.

- The project is consistent with the proposed Draft Borrego Springs Community Plan which, in Policy LU 4.5.2, encourages the use of existing fallowed farmlands for the installation of solar farms for energy production.

Impacts from the Higher Elevations:

- There would be no views from residences.

- Views would be of short duration. For autos, passengers would stop their vehicle, take in the view, and proceed.

- For trail users, this would involve a limited population and a limited period of time using the trails. In addition, this project would not obstruct any views from trails.

- All points at higher elevations are considerable distances from the project. At these distances the project would be similar to the agricultural uses occurring in the valley.

- The project is near and adjacent to the major agricultural areas in the northern part of the valley. At the distances involved, it would tend to blend in with the agricultural operations.

- Views from the third priority scenic highway, S22 would not be impacted because of points above.

- This project will not obstruct or obscure any views of the valley.

- The project is consistent with the proposed Borrego Springs

Community Plan which, in Policy LU 4.5.2, encourages the use of existing fallowed farmlands for the installation of solar farms for energy production.

# 1.0 INTRODUCTION

## 1.1 Purpose of the Visual Resources Report

The purpose of this study is to assess the visual impacts of the proposed Borrego 1 Solar Project, determine the significance of the impact under CEQA, and to proposed measures to avoid, minimize or mitigate adverse visual impacts associated with the construction of a 26 megawatt (MW) unmanned photovoltaic (PV) solar project on the surrounding visual environment.

## 1.2 Key Issues

The key issue to be analyzed is the visual impacts of the proposed project from the higher elevations to the west and east in the nearby vicinity of the Project. While these higher areas are a long distance from the project, the fact that the project covers 308 acres means that it could be seen from these areas. Most of the higher areas are uninhabited; however there are three areas that are frequented by the public, Font's Point, the Anza-Borrego State Park Visitor Center, and Montezuma Grade Overlook as it enters the Borrego Valley. In addition, Yaqui Pass Road and higher areas of the western valley floor, as well as areas near the Project location have been reviewed. Views from these points will be among the key issues addressed in this report.

## 1.3 Principal Viewpoints to be Covered

The principal viewpoints to be covered will be Font's Point, the Anza-Borrego State Park Visitor Center, and Montezuma Grade Overlook, Yaqui Pass, higher areas of the western valley floor, as well as areas near the Project location. Other areas will also be addressed, but only in terms of a lack of views.

# 2.0 PROJECT DESCRIPTION

The Borrego 1 Solar Project is a proposed photovoltaic (PV) solar generating facility located in San Diego County approximately 2 miles north-northeast of the center of the Community of Borrego Springs, California. The Project Site is southwest of the corner of Borrego Valley and Henderson Canyon Roads. The Project Site is approximately 308 acres of private land that has previously been used for agriculture (See Figure 1, Vicinity Map).

The PV panels will be mounted either on fixed tilt supports or single-axis trackers. The Project will be 26 MWac (32 MWdc).

The main project access will be located at the southeast corner of the site on Borrego Valley Road with a secondary access on Henderson Canyon Road. No sewer service or potable water is required as the facility would be unmanned. Water would be used for dust suppression during construction and the Project would use approximately two acre-feet of water annually during operation for cleaning the solar panels. This water will be provided from existing wells on the Project site.

The site would be grubbed to remove existing vegetation and almost no grading would be necessary as it is already level. The soil surface will be smoothed and compacted to prepare the site for installation of the solar panels. The construction period for the 26 MW phase (using either mounting system) is expected to be a 4-6 month timeframe.

The only off-site improvement associated with the Project is a 69kV generation-tie (gen-tie) transmission line from the site to SDG&E's existing Borrego Substation. The proposed gen-tie line is approximately one mile in length and would be located within the disturbed right-of-way on the west side of Borrego Valley Road. The interconnection at the existing substation would occur within a small expansion of its current footprint.

The current Plot Plans for this project are reproduced as Figures 2 and 2a.

## 2.1 Land Use Designations and Zoning

The property and the surrounding area is currently within the Rural Development Area (RDA) Regional Category (See Figure 3) and a Land use Designation of Multiple Rural Use (18) which requires parcel sizes of 4,8, and 20 acres depending upon slope (See Figure 4). Zoning on the property and the surrounding area is General Rural (S92) with a 4 acre minimum lot size.

The Draft Land Use Proposal for the General Plan Update is SR4 (Semi-Rural) with a density of .25 dwelling units per acre. The zoning proposed would remain S92 with a density of .25 dwelling units per acre.

## 2.2 Regulatory Framework

The regulatory frameworks which need to be considered in the evaluation of the visual impacts of this project are as follows:

1. The Recreation Element, Part IV of the San Diego County General Plan under "State Parks" States

> "Any proposal for private development will be reviewed to assure that there will be a minimum of adverse affect on the State Park"

2. The Scenic Highway Element, Part VI of the San Diego County General Plan lists Highway 78 as an Existing Official Scenic Highway from the western to the eastern boundary of Anza-Borrego Desert State Park. Additionally, S22 from State Route 79 to the Imperial County line is listed as a Third Priority Scenic Route.

3. The California State Streets and Highway Code, Section 260 in relation to designating certain highways as State Scenic Highways requires that

> "…the local governmental agencies have taken such action as may be necessary to protect the scenic appearance of the scenic corridor."

4. The County of San Diego Guidelines for Determining Significance and Report and Content Requirements for Visual Resources requires that:

> "A project will generally be considered to have a significant effect if it proposes any of the following, absent specific evidence to the contrary. Conversely, if a project does not propose any of the following, it will generally not be considered to have a significant effect on visual resources, absent specific evidence of such an effect:
>
> 1. The project would introduce features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual elements or the quality of the area (such as theme, style, setbacks, density, size, massing, coverage, scale, color, architecture, building materials, etc.) or by being inconsistent with applicable design guidelines.
>
> 2. The project would result in the removal or substantial adverse change of one or more features that contribute to the valued visual character or image of the neighborhood, community, or localized area, including but not limited to landmarks (designated), historic resources, trees, and rock outcroppings.
>
> 3. The project would substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from:
>
> • a public road,
> • a trail within an adopted County or State trail system,

• a scenic vista or highway, or
• a recreational area.

4. The project would not comply with applicable goals, policies or requirements of an applicable County Community Plan, Subregional Plan, or Historical Zoning."

5. The project will install highly reflective building materials, including but not limited to reflective glass and high-gloss surface color, that will create daytime glare and be visible from roadways, pedestrian walkways or areas frequently used for outdoor activities on adjacent properties.

5. California Sign Route Designation has criteria for numbered County Highways as follows:

a. County routes of major importance that are of general public interest.

b. County routes that are constructed to sufficient standards to guarantee safe passage to the motorist.

c. County routes that have a logical beginning and logical terminus without reference to city, County, or State Boundaries.

## 2.3 Design Policies and Guidances

The Desert Subregional Plan, Part XXI under subject 10 Policy 1, States that

"1. Any actions affecting land use within scenic highway corridors should emphasize the protection and enhancement of scenic resources."

The proposed Draft Borrego Springs Community Plan as recommended for approval by the Planning Commission on April 16, 2010, States

Policy LU-3.16.1 Any actions affecting land use within scenic highway corridors should emphasize the protection and enhancement of scenic resources."

"Policy LU 4.5.2 Encourage the use of existing fallowed farmlands for the installation of solar farms for energy production."

"Policy-COS 1.3.1 Require that physical impacts to the scenic vistas within the Plan area be minimized to a level that does not create visual blight or degrade upland landscapes."

No design review guidelines have been prepared for the Desert Subregional Area represented or unrepresented.

# 3.0 VISUAL ENVIRONMENT OF THE PROJECT

The visual environment will be discussed in relationship to 4 aspects, those of the project site, those in the immediate vicinity, those on the valley floor in general, and those in the higher elevations around the periphery of the valley. In the most general terms, the valley floor is a combination of natural vegetation, agriculture, resorts, often with golf courses, residential, commercial, and some industrial uses, and a ring of mountains which encloses much of the valley. Only to the southeast do the mo untains lose their continuity.

The Project Site:

The project site (See Figure 5) is level and has been used in the past for agriculture, as some of the wooden supports are still standing. At this point the vegetation appears dead, although stems are still in place. There are rows of trees to the north and west which were placed to protect from soils from wind erosion. There is a water tower approximately 45 feet in height and some buildings about midway along the western property line. The structures to be placed on the site will be dark blue and will stand about 5-7 feet in height, along with about 32 9X30 foot inverters if the project is a fixed array and 31 if the project is a tracker array that will have sunshades approximately 10 feet in height. See Figure 5a for a simulation of the project site after construction. The inverters sunshades will be a light grey or tan in color and are shown in Figure 5b.

PV solar panels are designed to absorb as much light as possible to maximize their efficiency in converting sunlight to electricity. Both thin film and monocrystalline solar panels have the same general visual characteristics because both are made of dark-colored material designed to absorb light and both are covered by glass. Because PV panels are covered with glass, they have the ability to create glare from the panels under certain conditions. This issue will be discussed more in the Visual Impact Assessment in Section 5.

The dead or dormant grasses on the site are of a light brown or yellow color, which contrasts sharply with the dark greens of the agriculture to the north and east and the pink or purple colors of the mountains beyond. It is comparable, however, to the abandoned agricultural areas to the west and south and the natural desert vegetation to the northeast. Additionally the adjacent agriculture is in citrus groves, which have a standardized pattern as opposed to the more random patterns of the project site, and the much more random patterns of the natural desert vegetation and the mountains beyond. Also, lines of site are expansive within the site, but limited in the surrounding area, due to the limited elevation differences.

The dominant feature in viewing the site is the vegetation of the site itself and the mountains beyond. The adjacent agriculture would be secondary, as well as the limited natural vegetation visible when viewing the site. In terms of continuity, the mountains would be the most continuous feature when viewing the site, with the view limited to agriculture, mountains, abandoned agriculture, and some natural vegetation. Taken together, views of the present site would tend to relate more to the mountains and other abandoned agricultural areas nearby and contrast with the agriculture to the

north and east. However, after construction, views of the site would correspond more with the agriculture to the north and east. Additionally, since the height of the structures is so low, the dominant feature of the view of the project site, the mountains, would not be affected by this project.

The Immediate Vicinity:

In the immediate vicinity the lack of elevation, the modest height of the proposed structures, and the extensive system of trees along the property boundaries limit views into the subject property. There are no homes in the vicinity that would have a view into the property and the only views from the property are to the south and a small area to the west, both of which are vacant. There are views along Borrego Valley Road for slightly more than a mile along the eastern boundary of the property, but this road has a thick row of trees along its eastern edge so there are no views beyond this road to the east (See Figure 6). The proposed transmission line connecting this facility to the Borrego Substation would be visible from this road. The transmission line would be attached to 52 foot high wooden poles along the west side of Borrego Valley Road for a distance of 1 mile. The proposed transmission line connecting this facility to the Borrego Substation would be visible from this road. The transmission line would be a new line along the west side of Borrego Valley Road attached to 52 foot high wooden poles a distance of 1 mile. This issue is discussed further as in Section 5.2 (Key Views) which will include a current view and simulated view of the power lines.

The immediate vicinity is that area that is located within one mile of the project boundaries. It is a combination of existing and abandoned agriculture, natural desert vegetation, and mountains in the background. The dead or dormant grasses on the abandoned agricultural site are of a light brown or yellow color, which contrasts sharply with the dark greens of the agriculture to the north and east and the pink or purple colors of the mountains beyond, but is comparable to the natural desert vegetation to the northeast. Additionally the adjacent agriculture is in citrus groves, which have a standardized pattern as opposed to the more random patterns of the project site, and the much more random patterns of the natural desert vegetation and the mountains beyond. Also, with the exception of views to the mountains, lines of site are limited in the immediate area, due to the limited elevation differences.

The dominant feature in the immediate area is the mountains in the background, however, at eye level, the existing agriculture would dominate due to the height of the trees and the contrasting color. The natural vegetation would be secondary because of its limited amount. In terms of continuity, the mountains would be the most continuous feature, with the view limited to agriculture, mountains, abandoned agriculture, and some natural vegetation. Taken together, views of the immediate area would tend to relate more to mountains and other abandoned agricultural areas nearby and contrast with the agriculture to the north and east. However, after construction, views of the site would correspond more with the agriculture to the north and east. Additionally, since the structures are so low in height, the dominant feature of the immediate area, the mountains, would not be affected by this project.

Other Parts of the Valley Floor:

Views from other parts of the valley floor of Borrego Springs are similarly obstructed as it is very level with occasional small ridges and is similar in elevation to the subject property. This fact, along with the modest height of the development, and the extensive tree system results in extremely limited views of this project from the valley floor. Positions 1- 4 (See Figures 7, 8, and 9) taken along Palm Canyon Drive illustrate this point as representative views from the south. From these locations there is no view of the project. In the higher elevations of the valley floor, there is an extremely limited view, which has been illustrated in simulations done from the intersection of Montezuma Valley Road and Palm Canyon Drive, and along Montezuma Valley Road as it first enters the valley floor. These locations have been designated as Key Views and will be discussed in Section 5.2.

The valley floor is a combination of existing and abandoned agriculture, natural desert vegetation, low density, scattered residential development, golf courses, and mountains in the background. The color of the natural vegetation contrasts sharply with the dark greens of the agriculture and the golf courses and, in some instances, landscaping around the homes, as well as the pink or purple colors of the mountains almost surrounding the valley. Additionally the agriculture is citrus groves, and has a standardized pattern while the golf courses tend to also have turf a standard height as well as color. The natural vegetation, the low density scattered homes, the mountain patterns, and to a lesser extent, the abandoned agriculture tend to be more of a random pattern. Also, with the exception of views to the mountains, lines of site are limited in the valley floor, due to the limited elevation differences and the vegetation.

The dominant feature in the valley floor views is the mountains in the background. The natural vegetation would be second because of its extent. Finally, the windrows and vegetation used in landscaping would be a less dominant feature. In terms of continuity, the mountains would be the most continuous feature, along with the vegetation of the windrows and the landscaping due to the level terrain which limits the extent of the views. Taken together, views of the valley floor would tend to relate more to mountains and landscape areas. After construction, since the structures are so low, and are obscured by vegetation, the dominant feature of the immediate area, the mountains, would not be affected by this project.

Higher Elevations:

The higher elevations in the mountains and on the periphery of the valley have key views from which the Project could be seen. These views are from a long distance, measuring roughly 5 to 7 miles. Due to the size of this project area and the contrasting color of the modules against the desert soils, the project will be visible, with the visibility increasing with higher elevation. However, since the project is adjacent to productive agriculture (See Figure 10), there are already contrasting colors in the vicinity with the only difference being this project will be dark blue as opposed to a variety of greens. Section 5.2 of this report provides current and simulated photos of this project from the Anza-Borrego State Park Visitor Center, Montezuma Grade Overlook, and Font's Point.

The higher elevations provide views of existing and abandoned agriculture, natural desert vegetation, low density, scattered residential development, golf courses, and mountains in the background. The color of the natural vegetation contrasts sharply with the dark greens of the agriculture and the golf courses, as well as the pink or purple colors of the mountains almost surrounding the valley. Additionally the agriculture has a standardized pattern, while the golf courses tend to also have turf a standard height as well as color. The natural vegetation, the low density scattered homes, the mountain patterns, and to a lesser extent, the abandoned agriculture tend to be a more random pattern. Also, lines of site are expansive and include the entire valley and the mountains beyond.

The dominant features from the higher elevations are the mountains in the background and the dark agricultural areas and golf courses that contrast with the much lighter natural vegetation. This is all in a backdrop of the natural vegetation and the scattered homes. In terms of continuity, the mountains would be the most continuous feature, along with the natural vegetation. Taken together, views of the higher elevations would tend to relate more to mountains, landscape areas, and natural vegetation. After construction, this project will blend with the contrasting agriculture adjacent to it and will not block any views from the mountains. Additionally, since the project is not located on existing vegetation, it will not affect any views of that visual resource.

## 3.1 Project Setting

The project is located in the northern area of the Borrego Valley. It is in the southern part of an extensive area of agriculture (See Figure 10) which is essentially level. The property is also basically level and is completely disturbed by previous agricultural activity. The viewshed for the valley floor is very limited due to the level topography, the modest heights of the structures, and the vegetation in the area. However, there is a second viewshed that has been established from the higher elevations on the periphery of the valley which will be discussed in the next section.

## 3.2 Project Viewshed

Because of the unique visual characteristics of the Borrego Valley, two viewshed have been prepared. Viewsheds were determined by topographical cross sections and then edited in the field based upon vegetation and structures that might affect views.

The local viewshed is shown on Figure 11, on the lower elevations of the valley floor, and has a very limited area. The modules are 5-7 feet high at their maximum and the inverter shades are 10 feet high. They are on an essentially level terrain where even short vegetation would block views. There is a row of vegetation along the west side of the property, orange groves to the north and vegetation and agriculture along the east, which begins about .25 miles south of Henderson Canyon Road. These features effectively block views from north and east. To the west there is a small gap in the trees along the western boundary that permits limited views from the vacant property to the west. To the south, the western row of trees continues south beyond the property, blocking views from the southwest. The agricultural operation

about a half mile from the property directly to the south would block views beyond the intervening property to the south. To the southeast views extend about .6 miles before being blocked by a small rise in elevation.

Figures 8 and 9 are views that someone would have from 4 points on Palm Canyon Drive—Christmas Circle, the intersection with Borrego Valley Road, De Anza Ready-mix, and the Borrego Valley Airport. The arrows on these photos show the location of the Project property if it could be seen. The purpose of these photos is to demonstrate the lack of views from the activity centers of the eastern valley.

This viewshed includes the transmission line previously discussed. This line will be attached to the wooden poles similar to those running along the eastern side of this road and will have very limited visual impact.

The remote viewshed is shown on Figure 12. This area is essentially that above the base of the mountains, and includes the higher areas of the alluvial fans. Locations from roughly 800 feet to 1000 feet in elevation were spot -checked in the field if there were homes or roads nearby to determine if these areas had a view of the property, and, if so, were added to this viewshed. Below 800 feet, the angle of sight was so small that unless a viewer was within the local viewshed, it was determined that there would be no view.

Areas within this viewshed are generally 5-7 miles from the project, but the area of the viewshed is large because of the size of the Project and the height of the surrounding mountains. A large percentage of this viewshed has no inhabitants or roads, and even trails are sparse. However, they involve entrances to the valley and some important features of the Anza Borrego State Park. These areas were considered Key Views and are discussed in Section 5.2.

## 3.3 Landscape Units

The landscape units will be the four aspects discussed in Section 3.0. These would be Project Site, the Immediate Vicinity, Other Areas of the Valley Floor, and the Higher Elevations.

### The Project Site:

The project site (See Figure 5) is level and has been used in the past for agriculture, as some of the wooden supports are still standing. At this point the vegetation appears dead, although stems are still in place. There are rows of trees to the north and west which were placed to protect soils from wind erosion. The structures to be placed on the site will be dark blue and will stand about 5-7 feet in height, along with about 32 9X30 foot inverters that will have sunshades approximately 10 feet in height. The inverters sunshades will be a light grey or tan in color.

The dead or dormant grasses on the site are of a light brown or yellow color, which contrasts sharply with the dark greens of the agriculture to the north and east and the pink or purple colors of the mountains beyond, but comparable to the abandoned

agricultural areas to the west and south and the natural desert vegetation to the northeast. Additionally the adjacent agriculture is citrus groves, which have a standardized pattern as opposed to the more random patterns of the project site, and the much more random patterns of the natural desert vegetation and the mountains beyond. Also, lines of site are expansive within the site, but limited in the surrounding area, due to the limited elevation differences.

The dominant feature in this landscape unit is the vegetation of the site itself and the mountains beyond. The agriculture adjacent as well as the limited natural vegetation would be secondary when viewing the site. In terms of continuity, the mountains would be the most continuous feature when viewing the site, with the view limited to agriculture, mountains, abandoned agriculture, and some natural vegetation. Taken together, views of the present site would tend to relate more to mountains and other abandoned agricultural areas nearby and contrast with the agriculture to the north and east. However, after construction, views of the site would correspond more with the agriculture to the north and east because of the pattern and the darker color of the panels. Since the structures are so low, the dominant feature of the view of the project site, the mountains, would not be affected by this project.

The Immediate Vicinity:

In the immediate vicinity, the lack of elevation, the modest height of the proposed structures, and the extensive system of trees along the property boundaries limit views into the subject property. There are views along Borrego Valley Road for slightly more than a mile along the eastern boundary of the property, but this road has a thick row of trees along its eastern edge so there are no views beyond this road to the east (See Figure 6). The proposed transmission line connecting this facility to the Borrego Substation would be visible from this road. The transmission line would be a new line along the west side of Borrego Valley Road attached to 52 foot high wooden poles and run a distance of 1 mile. A current view and a simulated view of the power lines are discussed in Section 5.2.

The immediate vicinity is a combination of existing and abandoned agriculture, natural desert vegetation, and mountains in the background. The dead or dormant grasses on the abandoned agricultural site are of a light brown or yellow color, which contrasts sharply with the dark greens of the agriculture to the north and east and the pink or purple colors of the mountains beyond, but is comparable to the natural desert vegetation to the northeast. Additionally the adjacent agriculture is citrus groves, which have a standardized pattern as opposed to the more random patterns of the project site, and the much more random patterns of the natural desert vegetation and the mountains beyond. Also, with the exception of views to the mountains, lines of site are limited in the immediate area, due to the limited elevation differences.

The dominant feature in the immediate area is the mountains in the background. At eye level, the existing agriculture would be dominant due to the height of the trees and the contrasting color. The natural vegetation would be secondary because of its limited amount. In terms of continuity, the mountains would be the most continuous feature, with the view limited to agriculture, mountains, abandoned agriculture, and some

natural vegetation. Taken together, views of the immediate area would tend to relate more to mountains and other abandoned agricultural areas nearby and contrast with the agriculture to the north and east. However, after construction, views of the site would correspond more with the agriculture to the north and east. Additionally, since the structures are so low, the dominant feature of the immediate area, the mountains, would not be affected by this project.

Other Parts of the Valley Floor:

Views from other parts of the valley floor of Borrego Springs are generally obstructed as it is very level with occasional small ridges and is similar in elevation to the subject property. This fact, along with the modest height of the development, and the extensive tree system results in extremely limited views of this project from the valley floor. Positions 1- 4 (See Figures 7, 8, and 9) taken along Palm Canyon Drive illustrate this point as representative views from the south, as from these locations there is no view of the project. In the higher elevations of the valley floor, there is an extremely limited view, which has been illustrated in simulations done from the intersection of Montezuma Valley Road and Palm Canyon Drive, and along Montezuma Grade as it first enters the valley floor. These locations have been designated as Key Views and will be discussed in Section 5.2.

The valley floor is a combination of existing and abandoned agriculture, natural desert vegetation, low density, scattered residential development, golf courses, and mountains in the background. The color of the natural vegetation contrasts sharply with the dark greens of the agriculture, the golf courses, landscaping around the homes if they are near enough to the viewer, as well as the pink or purple colors of the mountains almost surrounding the valley. Additionally the agriculture is citrus groves, and has a standardized pattern while the golf courses tend to also have turf a standard height as well as color. The natural vegetation, the low density scattered homes, the mountain patterns, and to a lesser extent, the abandoned agriculture tend to be more of a random pattern. Also, with the exception of views to the mountains, lines of site are limited in the valley floor, due to the limited elevation differences and the vegetation.

The dominant feature in the valley floor views is the mountains in the background. The natural vegetation would be second because of its extent. Finally, the windrows and vegetation used in landscaping would be a less dominant feature. In terms of continuity, the mountains would be the most continuous feature, along with the vegetation of the windrows and the landscaping due to the level terrain which limits the extent of the views. Taken together, views of the valley floor would tend to relate more to mountains and landscape areas. After construction, since the structures are so low, and are obscured by vegetation. The dominant feature of the immediate area, the mountains, would not be affected by this project.

Higher Elevations:

The higher elevations provide a combination of existing and abandoned agriculture,

natural desert vegetation, low density, scattered residential development, golf courses, and mountains in the background. The color of the natural vegetation contrasts sharply with the dark greens of the agriculture and the golf courses, as well as the pink or purple colors of the mountains almost surrounding the valley. Additionally the agriculture has a standardized pattern while the golf courses tend to also have turf a standard height as well as color. The natural vegetation, the low density scattered homes, the mountains and to a lesser extent, the abandoned agriculture, tend to be more of a random pattern. Also, lines of site are expansive and include the entire valley and the mountains beyond.

The dominant features from the higher elevations are the mountains in the background and the dark agricultural areas and golf courses that contrast with the much lighter natural vegetation. This is all in a backdrop of the natural vegetation and the scattered homes. In terms of continuity, the mountains would be the most continuous feature, along with the natural vegetation. Taken together, views from the higher elevations would relate more to the mountains, agriculture, and golf courses, as well as the natural vegetation. After construction, this project will blend with the contrasting agriculture adjacent to it and will not block any views of the mountains. Additionally, since it is not located on existing vegetation, it will not affect any views of that visual resource.

# 4.0 EXISTING VISUAL RESOURCES AND VIEWER RESPONSE

## 4.1 Existing Visual Resources

### 4.1.1 Visual Character

The existing visual character of Borrego Springs is one of low density and widely spaced residences and planned developments and resort communities often designed around a golf course. The commercial areas, concentrated on the east and west of Christmas Circle, are an eclectic combination of desert architecture constructed over a long period of time. Buildings are generally small with the exception of the Mall, and surfaced in muted desert colors (See Figures 13 and 14). The community is also very sensitive to the historical features situated throughout the valley.

There has historically been a significant agricultural presence in the valley which has left its mark on the visual character. From the areas of higher elevation this provides for a checkerboard look in the northeastern area of the valley (See Figure 10).

This project will not be visible from the majority of the valley floor. From the higher reaches, it will blend with the agricultural patterns already a part of the visual character.

### 4.1.2 Visual Quality

Borrego Springs has developed over a period of time and does not have a distinctive architectural theme other than what has been described above. The real visual quality is the natural landscape set in a framework of the imposing mountains surrounding the valley on several sides. Much of this natural landscape is preserved in the Anza Borrego State Park. The valley floor is not a part of the park and is sparsely developed in a wide variety of architectural styles, as well as the golf courses and several planned developments and resorts. Finally the agriculture, especially in the northeastern part of the valley has created its own vivid and unified portion of the landscape unit, with the dark green squares. It is within this area that the proposed project will be located and will be in harmony with that part of the landscape. Below is a discussion of the visual quality for each of the four landscape units identified in the previous section.

Project Site:

The project site and the background is composed of muted colors, however the existing agriculture which is adjacent is part of this landscape unit and is a rather intense dark green color. The mountains, although muted, contrast against the normally clear blue sky. Other than the mountains, which are consistent through the landscape unit, there is little unity in the view of this landscape unit. The abandoned agriculture is one aspect, while the existing agriculture and the natural vegetation are others, but none of these are consistent through the panorama of this landscape unit.

Finally this is a landscape that has gone through several changes from the original natural vegetation, with major parts being changed through conversion to agriculture and then abandoning that use. The mountains are the most intact part of the landscape, and only the existing agriculture is unbroken and intact for the extent of that use's location. The Landscape unit does not offer striking or distinctive patterns and therefore a strong visual impression is not created.

Immediate Vicinity:

The immediate vicinity and its background is composed of muted colors, however the existing agriculture visible in this landscape unit is a rather intense dark green color, and the mountains, although muted, contrast against the normally clear blue sky. Other than the mountains, which are consistent through the landscape unit, there is little unity in the other aspects. The abandoned agriculture, the existing agriculture and the natural vegetation divide the rest of this unit with none of these consistent through the panorama of this landscape unit. Finally some aspects of this landscape unit have undergone changes with major parts being changed through conversion from natural vegetation to residential uses and golf courses, agriculture, and scattered homes. The mountains and the natural vegetation are the most intact part of the landscape, The Landscape unit does not offer striking or distinctive patterns and therefore a strong visual impression is not created.

Other Parts of the Valley Floor:

The other parts of the valley floor and its background are composed of muted colors, however the existing agriculture visible in this landscape unit is a rather intense dark green color, and the mountains, although muted, contrast against the normally clear blue sky. The golf courses, where visible, also provided a vivid dark green color from the turf used. The mountains, which are consistent through the landscape unit, and the natural vegetation found throughout this unit are the only aspects which have unity.

The scattered homes, golf courses, and existing agriculture divide the rest of this unit, with none of these consistent through the panorama of this landscape unit. Finally some aspects of this landscape unit have undergone changes with major parts being changed through conversion from natural vegetation to residential uses and golf courses, agriculture, and scattered homes. The mountains and the natural vegetation are the most intact part of the landscape. The Landscape unit does not offer striking or distinctive patterns and therefore a strong visual impression is not created.

Higher Elevations:

The higher elevations provide a combination of existing and abandoned agriculture, natural desert vegetation, low density, scattered residential development, golf courses, and mountains in the background. The color of the natural vegetation contrasts sharply with the dark greens of the agriculture and the golf courses, as well as the pink or purple colors of the mountains almost surrounding the valley. Additionally the agriculture has a standardized pattern while the golf courses tend to also have turf a

standard height as well as color. The natural vegetation, the low density scattered homes, the mountain patterns, and to a lesser extent, the abandoned agriculture tend to be more of a random pattern. Also, lines of site are expansive and include the entire valley and the mountains beyond.

The dominant features from the higher elevations are the mountains in the background and the dark agricultural areas and golf courses that contrast with the much lighter natural vegetation. This is all in a backdrop of the natural vegetation and the scattered homes. In terms of continuity, the mountains would be the most continuous feature, along with the natural vegetation. Taken together, views from the higher elevations relate to the mountains, agriculture, and golf courses, as well as the natural vegetation. After construction, this project will blend with the contrasting agriculture adjacent to it and will not block any views of the mountains. Additionally, since it is not located on existing vegetation, it will not affect any views of that visual resource.

The views from the higher elevations and its background are composed of muted colors, however the existing agriculture visible in this landscape unit is a rather intense dark green color, and the mountains, although muted, contrast against the normally clear blue sky. The golf courses also provide a vivid dark green color from the turf used. The mountains, which are consistent through the landscape unit, and the natural vegetation found throughout this unit are the only aspects which have unity. The scattered homes, golf courses, and existing and abandoned agriculture divide the rest of this unit, with none of these consistent through the panorama of this landscape unit. Finally some aspects of this landscape unit have undergone changes, such as the agriculture, golf courses, and the scattered homes. The mountains and the natural vegetation are the most intact part of the landscape, with major parts being changed through conversion from natural vegetation to residential uses, golf courses.

From this landscape the mountains, the golf courses, and agriculture and the desert landscape all come together to create a distinctive visual pattern.

## 4.2 Viewer Response

Viewer response is based on both viewer sensitivity and viewer exposure. These elements influence how a viewer may overall respond to a change in the visual landscape, particularly with regard to development of a site from a generally undeveloped condition. Viewer response varies based upon the type of viewer and the characteristics of the visual environment that would ultimately be affected (i.e., urban versus rural environment, established large-scale commercial area versus low density residential uses, etc.). Viewer response is largely influenced by viewer sensitivity and viewer exposure as described in greater detail below. Figure 15, Surrounding Land Uses, identifies surrounding land uses and their approximate distance to the project. Note that this Figure has identified the Immediate Area considered to be one mile, and has also gone a short distance beyond one mile if there are sensitive viewer areas slightly beyond the Immediate Area Boundary. As can be seen, there are 4 residences,

none which would have a view of this property due to intervening vegetation, and no commercial buildings, or parkland /recreational uses in the immediate vicinity. There are some views from the Anza-Borrego State Park, in particular, from trails and overlooks coming into the valley, but these views are at a substantial distance and generally these trails are taken to view unique features along the trails, as overlooks to the valley are available in a number of other places in the Park.. From these distances, the dark blue of the panels would blend with the adjacent dark green agriculture.

Beyond the one mile boundary there are sensitive viewer areas nearby. This would be a residential unit approximately 1.1 miles to the west, the De Anza Country Club at 1.4 miles to the west at its nearest point, and the Springs Resort at 1.2 miles to the southwest. Again, none of these viewer areas will have a view of this property due to intervening vegetation.

Viewer response on the valley floor beyond the immediate vicinity would be low, in that views beyond those discussed in the paragraph above are mostly limited by the existing vegetation on the valley floor. There are trees in the vicinity of residences and also the windrows along property boundaries which extend in all cardinal directions and at times for several miles which will block views into this property. Additionally, these views are of a long distance, and with the dark blue color of the panels, will blend in with the already existing dark green of the agricultural areas in the vicinity.

Viewer response in the higher elevations would be different than that of the valley floor, but still low. The property is visible from Fonts Point and the Montezuma Valley Road Overlook, the State Park Visitor Center, Yaqui Pass Road, and the Intersection of S2 and Palm Canyon Drive. Fonts Point views are of a very long distance and access is by a difficult and challenging unpaved road with segments of soft sand. In addition, the purpose in traveling to this point is not the view of the Borrego Valley, but the Borrego Badlands. Finally, the view of this project is only from the parking lot and not the viewpoint of the Badlands.

The project will also be visible from this the Montezuma Grade Overlook point, although at a considerable distance. This will minimize details within the landscape. Existing views from this vantage point are across the Borrego Valley and consist of developed areas within Borrego Springs, surrounding undeveloped lands, and mountain ranges in the background. Although a view of scenic value occurs at this point, due to the distance and associated lack of visual detail or coherence of the landscape components, viewer response would not be negative.

The project will have limited visibility from the State Park Visitor Center, and is at a considerable distance and very low angle, thus viewer response is anticipated to be low. This will minimize details within the landscape. Existing views from this vantage point are across the Borrego Valley and consist of developed areas within Borrego Springs, surrounding undeveloped lands, and mountain ranges in the background. Although a view of scenic value occurs at this point, due to the distance and associated lack of visual detail or coherence of the landscape components, the project would not reduce from visual quality and character. Additionally the project is surrounded by

agriculture which has a dark green color and the dark blue color of this project will not result in a sharp contrast. Finally the structures will be no higher than 10 feet.

There will be very limited visibility of the project S3 (Yaqui Pass Road) as it enters the valley from the south. The distance of 9.2 miles will minimize details within the landscape. Although a view of scenic value occurs at this point, due to the distance and associated lack of visual detail or coherence of the landscape components, the project would not impact viewer response negatively. Additionally the project is adjacent to ongoing agriculture on two sides which has a dark green color and the dark blue color of this project will not result in a sharp contrast. Finally the structures will be no higher than 10 feet.

Finally, the view from S22 (Montezuma Valley Road) as it first enters the valley from the west also provides some limited views. This distance of this property from this point will minimize details within the landscape. Although a view of some scenic value occurs at this point, due to the distance and associated lack of visual detail or coherence of the landscape components, the project would not result in a negative viewer response. Additionally the project is adjacent to ongoing agriculture on two sides which has a dark green color and the dark blue color of this project will not result in a sharp contrast. Finally the structures will be no higher than 10 feet and views would be at a low angle. This results in the project appearing much smaller than it is, and also makes the view subject to interruption by intervening vegetation.

### 4.2.1 Viewer Sensitivity

This project has been preliminarily presented to the Borrego Springs Sponsor Group. No design guidelines have been prepared and there is no design review board. A review of the current Desert Subregional Plan regarding viewer sensitivity reveals one policy regarding protecting and enhancing scenic resources by action taken which affect scenic highways.

Under subject 10 Policy 1, It is stated that

> "1. Any actions affecting land use within scenic highway corridors should emphasize the protection and enhancement of scenic resources."

A review of the proposed Draft Borrego Springs Community Plan which would be part of the General Plan Update when adopted, discusses visual resources in three areas:

- Policy LU-3.16.1 Any actions affecting land use within scenic highway corridors should emphasize the protection and enhancement of scenic resources."

- Policy LU 4.5.2 Encourage the use of existing fallowed farmlands for the installation of solar farms for energy production."

- 'Policy COS 1.3.1 which requires that physical impacts to the scenic vistas within the Plan area be minimized to a level that does not create visual blight or degrade upland landscapes."

This project is not at the point in the process that official public input has been provided. However the Eurus Energy Borrego Solar Farm, Major Use Permits P09-012 and P09-014 were heard at the San Diego County Planning Commission on October 8, 2010. At this hearing there were 5 persons speaking in opposition to the project. Concerns included visual impacts, glare that could impact airplane pilots, and surrounding views, as well as groundwater, disturbance of crypto-bionic soils, cumulative impacts, adequacy of the environmental document and the need to underground utilities. This project was approved unanimously at that hearing, The decision of approval was appealed to the Board of Supervisors, which heard the appeal on January 12, 2011. On that date, the Board of Supervisors, with an amendment, took action to approve the Planning Commission Recommendation thereby approving the project.

Both the policies in the proposed Borrego Springs and the reaction of the public to the Eurus Project indicate a high level of sensitivity in the community toward visual resources in Borrego Springs.

### 4.2.2 Viewer Groups

Residential Groups:

This project is located in the agricultural area of Borrego Springs and there are no residences located within the local viewshed, however 4 residences are located within the "immediate vicinity" (one mile) of the project. None of those residences have a view of the property and therefore have not been included within a viewshed. Within the remote viewshed there would be very few residences and the views would generally be in excess of 5 miles. Subregion. The first is Highway 78 which

Viewer Groups with a View of the Project from Scenic Highways and Vista Points:

There are two scenic highways in the Desert is a California Official Scenic Highway. This highway runs approximately 10 miles to the south and does not have a view of this project. S22 runs across the Planning area from east to west, coming into the valley at Montezuma Grade where there is a vista point, and having a view of the property. This overlook is 7.18 miles from the property. Once on the valley floor, travelers on S22 would have a very limited view of this property as simulated on Figures 24 and 25. The visual impacts from the overlook and a simulated view will be discussed in Section 5.2.

Recreational Viewer Groups:

This would include viewer groups using the Anza-Borrego State Park Visitor Center, trails within the State Park, and those visiting Font's Point. The State Park Visitor

Center is 4.07 miles and Font's Point is 7.5 miles from the project. The visual impacts from these 2 points and simulated views will be discussed in Section 5.2.

For those groups using trails, there are 2 trails/primitive roads shown on the Anza-Borrego Desert State Park Map that would have a view of this project. One from Lookout Point, some 7 miles from the project on the Montezuma Grade, another one going to Coyote Canyon. The latter is in the mountains to the north of the valley.

For those groups visiting Font's Point, it is accessible only with a 4 wheeled drive vehicle. The point itself does not have a view of this property, but the parking area, which is at a higher elevation, would have a view. This point is 7.5 miles from the project. The visual impacts from this point and a simulated view will be discussed in Section 5.2.

### 4.2.3 Viewer Exposure

It does not appear that there are any residences that will be exposed to a view of any consequence and thus there will be no stationary views. Most people exposed to somewhat longer views will be visitors at the Anza-Borrego State Park Visitor Center and those visiting Font's Point. In the case of Font's Point, it can only be reached by a 4 wheeled drive vehicle and would have considerably less volume of visitors than the Visitor's Center. Additionally, the project is not actually visible from Font's Point, but from the parking areal. Visitors traveling to this point are not necessarily traveling there for a view of the valley, but a view of the Borrego Badlands. Views of the Project area are likely to be limited to time spent getting in and out of a vehicle.

The Visitor's Center has an overlook, but again this is not the purpose of most visits. Most visits are for the attractions offered by the Visitor's Center and the overlook is secondary. Thus durations of views are likely to be limited from this point.

Views from the Montezuma Grade Overlook would also be of limited duration. Other than the view of the valley there are no other attractions accessed from this point such as trails or other recreation. This would represent the view for vehicles traveling into the valley along Montezuma Valley Road. This is a steep and winding road that would require the concentration of the driver. Passengers would be free to see the view, but will be doing so through a windshield of a moving vehicle unless they stop at the overlook.

### 4.2.4 Viewer Awareness

There will not be views of importance from anyone's home. Additionally, residents who drive from Borrego Springs so other parts of San Diego County or Imperial County on a continuing basis may not register visual changes on a continuing basis. The visitors to the park and resorts would likely be the ones most aware of visual changes. For this reason, these recreational areas in the valley have been some of the key views considered.

# 5.0 VISUAL IMPACT ASSESSMENT

## 5.1 Guidelines for Determining Significance

The County of San Diego Guidelines for Determining Significance and Report and Content Requirements State that:

> "A project will generally be considered to have a significant effect if it proposes any of the following, absent specific evidence to the contrary. Conversely, if a project does not propose any of the following, it will generally not be considered to have a significant effect on visual resources, absent specific evidence of such an effect:
>
> 1. The project would introduce features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual elements or the quality of the area (such as theme, style, setbacks, density, size, massing, coverage, scale, color, architecture, building materials, etc.) or by being inconsistent with applicable design guidelines.
>
> 2. The project would result in the removal or substantial adverse change of one or more features that contribute to the valued visual character or image of the neighborhood, community, or localized area, including but not limited to landmarks (designated), historic resources, trees, and rock outcroppings.
>
> 3. The project would substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from:
>
> • a public road,
> • a trail within an adopted County or State trail system,
> • a scenic vista or highway, or
> • a recreational area.
>
> 4. The project would not comply with applicable goals, policies or requirements of an applicable County Community Plan, Subregional Plan, or Historical Zoning."
>
> 5. The project will install highly reflective building materials, including but not limited to reflective glass and high-gloss surface color, that will create daytime glare and be visible from roadways, pedestrian walkways or areas frequently used for outdoor activities on adjacent properties.

## 5.2 Key Views

Key Views have been selected and have had simulations prepared which show the clearest views of this project. Three of these views would be seen primarily by visitors

to the valley and one shows the location of the proposed transmission line to the SDG&E Substation. Figure 16 shows the location of these views.

To enhance the discussion of these views, use was made of the Bureau of Land Management Visual Resource Management (VRM) form for assessing the visual qualities of a landscape. This form has two stages, inventory and analysis. The analysis stage is specific to the Bureau of Land Management, but the inventory stage can be readily applied to assess the visual qualities of any landscape. Therefore, the form was altered to only include the inventory stage. Three factors are considered in developing the VRM inventory: 1) Scenic Quality Rating, 2) Sensitivity Level, and 3) Distance Zones. Rating based upon this form will be included in the discussions below for each Key View. The actual rating forms for each Key View have been included in Appendix A, as well as explanations of the various terms used in these assessments. It should be noted that VRM uses the term "Key Observation Point" as opposed to the term Key View as found in this report. For purposes of this report, the terms "Key Views" and "Key Observation Points" may be used interchangeably.

Key View #1

This view is from the Montezuma Grade Overlook as you enter the valley along the Montezuma Grade, part of Highway S22 It is oriented to the Northeast toward the project and is at an elevation of 2291 feet. This view is 7.18 miles from the farthest point on the Project property. S22 is a Third Priority Scenic Highway in the Scenic Highway Element and Scenic Highways are to be protected by a policy in the Desert Subregional Plan.

The project will be visible from this point, although at a considerable distance. This will minimize details within the landscape. Existing views from this vantage point are across the Borrego Valley and consist of developed areas within Borrego Springs, surrounding undeveloped lands, and mountain ranges in the background. Although a view of scenic value occurs at this point, due to the distance and associated lack of visual detail or coherence of the landscape components, the project would not reduce from visual quality and character.

Views of the solar panels from this roadway would be limited and viewer response to the visual change resulting with the project is anticipated to be low. Similarly, views of the utility poles installed would be generally nonexistent, due to the height and scale of the poles, and other more visibility noticeable features within the landscape that would attract a viewer's attention. As such, installation of the solar panels and associated facilities would not significantly detract from or contrast with the existing visual character and or quality of the community, and impacts would be less than significant.

Figure 17 shows the view as it now exists and a simulated view after the project. As the simulation shows, the project almost completely blends with the agriculture at this distance. It is also at a low angle so that the project will not appear to occupy a large amount of area.

The VRM assessment for the Montezuma Grade Overlook shows a Scenic Quality Rating of "A." a Sensitivity Level rating of "High," and the Distance Zone rating of "Background."

Key View #2

This view is from the Anza-Borrego Desert State Park Visitor Center on the western end of the valley. The view is oriented to the Northeast toward the project and is at an elevation of 822 feet. This view is 4.07 miles from the nearest point on the Project property. This is a popular view of the valley, but due to its lower location, it is not as dramatic as Key View #1. Additionally most people come to this point because of the attractions offered in the Visitors Center and not to view the valley.

The project will have limited visibility from this point, and is at a considerable distance and very low angle. This will minimize details within the landscape. Existing views from this vantage point are across the Borrego Valley and consist of developed areas within Borrego Springs, surrounding undeveloped lands, and mountain ranges in the background. Although a view of scenic value occurs at this point, due to the distance and associated lack of visual detail or coherence of the landscape components, the project would not reduce from visual quality and character. Additionally the project is surrounded by agriculture which has a dark green color and the dark blue color of this project will not result in a sharp contrast. Finally the structures will be no higher than 10 feet.

As view of the PV solar panels from this point would be limited, and viewer response to the visual change resulting with the project is anticipated to be low. Similarly, views of the utility poles installed would be generally nonexistent, due to the height and scale of the poles and other more visibility noticeable features within the landscape that would attract a viewer's attention. As such, installation of the PV solar panels and associated facilities would not significantly detract from or contrast with the existing visual character and or quality of the community, and impacts would be less than significant.

Figure 18 shows the view as it now exists and a simulated view after the project. As the simulation shows, the project almost completely blends with the agriculture at this distance. It is also at a low angle so that the project will not appear to occupy very much area.

The VRM assessment for the Visitor's Center shows a Scenic Quality Rating of "A." a Sensitivity Level rating of "High," and the Distance Zone rating of "Background."

Key View #3

This view is from the parking area of Font's Point in the eastern area of the valley. It is oriented to the Northwest toward the project and is at an elevation of 1264 feet. This view is 7.5 miles from the nearest point on the Project property. This Point is accessible only by a 4 wheeled drive vehicle and is approximately 2 miles south of S22. There is no view of the Project from the actual Font's Point location, but there is from the parking area for the Point. The main attraction at Font's Point is the Borrego

Badlands to the south and not the valley floor. The project will be visible from this point in the parking area, although at a considerable distance. This will minimize details within the landscape. Existing views from this vantage point are across the Borrego Valley and consist of developed areas within Borrego Springs, surrounding undeveloped lands, and mountain ranges in the background. Although a view of scenic value occurs at this point, due to the distance and associated lack of visual detail or coherence of the landscape components, the project would not reduce from visual quality and character. Additionally the project is adjacent to ongoing agriculture on two sides which has a dark green color and the dark blue color of this project will not result in a sharp contrast. Finally the structures will be no higher than 10 feet.

As view of the solar panels from this point would be extremely limited, viewer response to the visual change resulting with the project is anticipated to be low. Similarly, views of the utility poles installed would be generally nonexistent, due to the height and scale of the poles and other more visibility noticeable features within the landscape that would attract a viewer's attention. As such, installation of the PV solar panels and associated facilities would not significantly detract from or contrast with the existing visual character and or quality of the community, and impacts would be less than significant.

Figure 19 shows the view as it now exists and a simulated view after the project. As the simulation shows, the project is barely discernable from the agriculture at this distance.

The VRM assessment for Fonts Point shows a Scenic Quality Rating of "B." a Sensitivity Level rating of "Moderate," and the Distance Zone rating of "Background."

Key View #4

This view is from Borrego Valley Road. It is oriented directly to the south away from the project and is at an elevation of 580 feet. This view is designed to provide an idea of the visual results of the transmission line that will extend from the property to the SDG&E substation. This line will run approximately 1 mile along the west side of Borrego Valley Road. Existing views from this vantage point are across the Borrego Valley to the south and consist of surrounding undeveloped lands, and mountain ranges in the background. Although a view of scenic value occurs at this point, it is focused a considerable distance toward the mountains to the south. The lack of mass associated with transmission lines would result in the project having no reduction in visual quality and character. Viewer response to the visual change resulting from this aspect of the project is anticipated to be low. As such, installation of the solar panels and associated facilities would not significantly detract from or contrast with the existing visual character and or quality of the community, and impacts would be less than significant.

Figure 20 shows the view as it now exists and a simulated view after the project.

The VRM assessment for this part of Borrego Valley Road shows a Scenic Quality Rating of "B." a Sensitivity Level rating of "Low," and the Distance Zone rating of "Foreground."

Key View #5

This view is from Borrego Valley Road. It is oriented toward the northwest of the project and is at an elevation of 580 feet. This view is designed to provide an idea of the visual characteristics of the completed project at a close vantage point. Existing views from this vantage point consist of the agriculture to the northwest with the mountains in the background. Although a view of scenic value occurs at this point, it is degraded to some extent because of the dominance of the agriculture and lack of natural landscape, and implementation of the project would detract little from the existing view. Because of the trees on the east side of the road, this view would only be available for travelers on Borrego Springs Road, which is not heavily traveled and is not a Scenic Highway. As such, construction of the project would not significantly detract from or contrast with the existing visual character and or quality of the community. Viewer response to the visual change resulting with the project is anticipated to be low and impacts would be less than significant.

Figure 21 shows the view as it now exists and a simulated view after the project.

The VRM assessment for this part of Borrego Valley Road shows a Scenic Quality Rating of "B." a Sensitivity Level rating of "Low," and the Distance Zone rating of "Foreground."

Key View #6

This view is from Borrego Valley Road south of the SDG&E Substation and is to provide an idea of the changes that will be required at the Substation to implement this project. Figure 22 shows the substation as it now exists, and Figure 22a shows a simulation of changes that will be made to the substation as a result of the implementation of this project.

Existing views from this vantage point are across the Borrego Valley to the south and consist of surrounding undeveloped lands, and mountain ranges in the background. Although a view of scenic value occurs at this point, it is focused a considerable distance toward the mountains to the south. The improvements that would be visible are anticipated would be minor in nature. The lack of mass associated with these anticipated improvements will not cause a reduction from visual quality and character. Viewer response to the visual change resulting from this aspect of the project is anticipated to be low. As such, installation of the solar panels and associated facilities would not significantly detract from or contrast with the existing visual character and or quality of the community, and impacts would be less than significant.

Figure 22 shows the substation as it now exists, and Figure 22a shows a

simulation showing changes that would be required for project implementation

The VRM assessment for the view of the substation shows a Scenic Quality Rating of "C." a Sensitivity Level rating of "Low," and the Distance Zone rating of "Foreground."

Key View #7

This view is from S3 (Yaqui Pass Road) as it enters the valley from the south. Views at this point are some 9.2 miles from the project and at this point, the elevation is 1532 feet. This distance will minimize details within the landscape. Existing views from this vantage point are across the Borrego Valley and consist of developed areas within Borrego Springs, agricultural lands, undeveloped lands, and mountain ranges in the background. Although a view of scenic value occurs at this point, due to the distance and associated lack of visual detail or coherence of the landscape components, the project would not reduce visual quality and character. Additionally the project is adjacent to ongoing agriculture on two sides which has a dark green color and the dark blue color of this project will not result in a sharp contrast. Finally the structures will be no higher than 10 feet. Although this road has been designated as a "County Sign Route", it is not a Scenic Priority Route listed within the Scenic Highway Element of the San Diego County General Plan.

Views of the solar panels from this point would be extremely limited, and there is no official viewpoint established, so that the only views are available from a within a vehicle or the shoulder of the road. As such, installation of the PV solar panels and associated facilities would not significantly detract from or contrast with the existing visual character and or quality of the community, and impacts would be less than significant.

Figure 23 shows the view as it now exists and a simulated view after the project. As the simulation shows, the project is barely discernable from the agriculture at this distance.

The VRM assessment for Yaqui Pass Road shows a Scenic Quality Rating of "A." a Sensitivity Level rating of "Moderate," and the Distance Zone rating of "Background."

Key View #8:

This view is from S22 (Montezuma Valley Road) as it first enters the valley from the west. Views at this point are some 3.71 miles from the project and at this point, the elevation is 864 feet. This distance will minimize details within the landscape. Existing views from this vantage point are across the Borrego Valley and consist of developed areas within Borrego Springs, agricultural lands, undeveloped lands, and mountain ranges in the background. Although a view of some scenic value occurs at this point, due to the distance and associated lack of visual detail or coherence of the landscape components, the project would not reduce from visual quality and character.

Additionally the project is adjacent to ongoing agriculture on two sides which has a

dark green color and the dark blue color of this project will not result in a sharp contrast. Finally the structures will be no higher than 10 feet and views would be at a low angle. This results in the project appearing much smaller than it is, and also makes the view subject to interruption by intervening vegetation.

Views of the solar panels from this point would be extremely limited, and there is no official viewpoint established or shoulder wide enough to park, so that the only views are available from a within a vehicle. As such, installation of the solar panels and associated facilities would not significantly detract from or contrast with the existing visual character and or quality of the community, and impacts would be less than significant.

Figure 24 shows the view as it now exists and a simulated view after the project. As the simulation shows, the project is barely discernable from the agriculture at this distance.

The VRM assessment for the Montezuma Valley Road as it enters the valley shows a Scenic Quality Rating of "B." a Sensitivity Level rating of "Moderate," and the Distance Zone rating of "Background."

Key View #9:

This view is from S22 (Montezuma Valley Road) as it Intersects with Palm Canyon Drive. Views at this point are some 3.23 miles from the project and at this point, the elevation is 773 feet. This distance will minimize details within the landscape. Existing views from this vantage point are across the Borrego Valley and consist of developed areas within Borrego Springs, agricultural lands, undeveloped lands, and mountain ranges in the background. Although a view of some scenic value occurs at this point, due to the distance and associated lack of visual detail or coherence of the landscape components, the project would not reduce from visual quality and character.

Additionally the project is adjacent to ongoing agriculture on two sides which has a dark green color and the dark blue color of this project will not result in a sharp contrast. Finally the structures will be no higher than 10 feet and views would be at a low angle. This results in the project appearing much smaller than it is, and also makes the view subject to interruption by intervening vegetation.

Views of the solar panels from this point would be extremely limited, and there is no official viewpoint established or road shoulder on which to park, so that the only views are available from a within a vehicle. As such, installation of the solar panels and associated facilities would not significantly detract from or contrast with the existing visual character and/or quality of the community, and impacts would be less than significant.

Figure 25 shows the view as it now exists and a simulated view after the project. As the simulation shows, the project is barely discernable from the agriculture at this distance.

The VRM assessment for the Montezuma Valley Road as it intersects with Palm Canyon Drive shows a Scenic Quality Rating of "B." a Sensitivity Level rating of "Moderate," and the Distance Zone rating of "Background."

Assessment of Visual Character and Visual Quality

The recognized views in this area are the views of the valley with a back drop of mountains from the higher elevations and views of the mountains from the higher elevations and the valley floor.

According to the analysis, the project would have very little visual impact from the valley floor and minimal visual impact from the higher elevations. At the higher elevations there is one public roadway, S22 which has a view of the desert floor with a backdrop of the mountains. If moving in a vehicle, there are several gaps where views of a relatively quick nature could be had by a passenger. There is one major paved viewpoint and a few gravel pull outs where a vehicle could stop with occupants getting out and looking at the view. S22 is a third priority scenic highway in the Scenic Highway Element of San Diego County General Plan.

Additionally, there is a trail/primitive road in the Anza-Borrego Desert State Park up Coyote Canyon that would have views for about 2 miles. This trail is roughly in the same location as the proposed Juan Bautista de Anza Historic Trail, and the area is accessible by foot or by a vehicle using an unpaved and very rough road, thereby limiting the number of people using it. Users of the trail are attracted by its palm groves and the Desert Gardens not necessarily its view. The project is first visible from approximately 4 miles from the project and stops being visible at six miles.

The project will be laid out with modules on a series of racks and a number of inverters. The modules will be 5-7 feet in height depending upon whether they will be designed to follow the sun, and the inverters will be 9 by 30 feet and have shades about 10 feet high. The areas in the higher elevations where the project will become visible are generally 4-7 miles from the project. From this distance the individual modules will not be discernible and together, because of their dark color, will appear similar to the agricultural uses in the area. There will be about 32 inverters spread over 300 acres whose size and bulk will be less than most buildings in Borrego Springs. The scale, bulk and coverage in terms of visual impacts will be discussed in Section 5.5.

Photo simulations of Key areas have previously been discussed and are found on Figures 17-25.

## 5.3 Assessment of Visual Character and Quality

### 5.3.1 Assessment of Visual Character

The visual character of the existing landscape in the immediate area of the project is agricultural, formerly agricultural, or natural desert, all with a backdrop of mountains. This project is not agricultural, but would blend with and be compatible with the current agricultural uses which are a part of the existing visual character of the area.

Existing Site:

The property is presently vacant with remnants of the previous agricultural activity. The site is presently covered with dead or dormant grasses with some stakes and other features of the previous agriculture. There are areas along the west and south sides of the property which also have these characteristics, as well as other sites in Borrego Valley. Thus the site currently does not conflict with the community character of this part of the Borrego Valley.

During Construction:

The property will be constructed in one phase depending on the final design and will provide 26MVac. Grading for the entire site will take place with the first Phase. Construction will go through stages, starting with the existing site, during cons truction, end of construction, and maturity.

The property is generally level and only limited grading required. Since the local viewshed for the project is so limited and the remote viewshed is at such distances, grading and construction should go on relatively unnoticed. In addition, the cleared soil, from any kind of distance will cause the site to look similar to what it does at the present. Therefore there will not be significant changes to existing visual character during the construction phase.

Completion of Construction:

The construction of the project will result in significant coverage of the site with panels. These panels will be dark blue and while they will amount to a change from the dead and dormant grasses, but they will blend with the dark green agriculture to the north and east so that the change will blend with what now exists. The change will be noticeable from a vantage point that is close to the site, however that would only be along Borrego Valley Road, which is not a heavily traveled road and is not a Scenic Highway.

Therefore there will not be significant changes to existing visual character during the construction phase.

Maturity:

Fire restrictions will not permit vegetation growth along the fences surrounding the property. Therefore the maturity stage of the project will be the same as the

completion of Construction Phase. As with the Completion of Construction Phase, the dark blue panels will blend with the agriculture at a distance, and the only views into the property are from Borrego Valley Road. Therefore there will not be significant changes to existing visual character during the construction phase.

### 5.3.2 Assessment of Visual Quality

The property is presently vacant with remnants of the previous agricultural activity and there is only weedy vegetation existing on the property so that grading will be hardly noticeable. Upon completion of construction the Project should blend well with the adjacent agricultural uses. An assessment of Visual Quality for each phase of the construction of the project is found below:

Existing Site:

The property is presently vacant with remnants of the previous agricultural activity. The site is presently covered with dead or dormant grasses with some stakes and other features of the previous agriculture. Thus the site does not enhance the present visual quality of the Borrego Valley. The local views into the property are severely limited due to the windrows and the existing agriculture.

During Construction:

The property is generally level and only limited grading required. Since the local viewshed for the project is so limited and the remote viewshed is at such distances, grading and construction should go on relatively unnoticed. In addition, the cleared soil, from any kind of distance will cause the site to look similar to what it does at the present. Therefore there will not be significant changes to visual quality during the construction phase.

Completion of Construction:

The construction of the project will result in significant coverage of the site with panels. These panels will be dark blue and while they will amount to a change from the dead and dormant grasses, but they will blend with the dark green agriculture to the north and east so that the change will blend with what is existing. The change will be noticeable from a vantage point that is close to the site. however, that would only be along Borrego Valley Road, which is not a heavily traveled road and is not a Scenic Highway. Therefore there will not be significant changes to visual quality during the completion of construction phase.

Maturity:

Fire restrictions will not permit vegetation growth along the fences surrounding the property. Therefore the maturity stage of the project will be the same as the co mpletion of Construction Phase. As with the Completion of Construction Phase, the dark blue panels will blend with the agriculture at a distance, and the only views into

the property are from Borrego Valley Road. Therefore there will not be significant changes to existing visual character during this construction phase.

## 5.4 Assessment of Viewer Response

In the lower elevations the limited height of the panels, minimal grading required with a lack of cut and fill slopes, and vegetation would limit the views in the immediate vicinity as well as the rest of the valley floor, as shown on Figures 6, 8, 9, 18, 20, 21, 22a, 24, and 25. In addition, only four single family homes are located closer than a mile from this property. Thus viewer exposure would be limited to those viewers at the higher elevations, generally traveling into the valley. These are also the viewers who would be most sensitive to the view as this is one way that visitors enter the valley for recreational purposes. These viewers would be likely to be more sensitive to views that those who travel the roads on a daily basis. They would also have the greatest expectation for views, having traveled some distance to visit the valley. These would be the viewers who will be a basis for judging visual quality.

These views are a considerable distance, as much as 7 miles, and this project will blend with the dark green agricultural features of that Landscape Unit. In addition, the architectural design of this facility, the panels and the inverters, will blend with the architectural features of this area, which are almost entirely greenhouses and agricultural buildings, so that the architecture on the project will not be obtrusive to a viewer. These features would also not be of a size that would cause them to stand out. The largest structure, the inverters, are 9 by 30 feet in length and width, and have a sun shade 10 feet high for a total of 270 square feet in area, Also the panels will be designed to minimize the potential for reflection and thereby reduce glare. As such, potential project-related glare effects for viewers form vantage points are anticipated to be none to minimal. Finally, the utilities poles used would not be visible from these distances, and there will be no additional poles required.

Viewer sensitivity has also been addressed in the policy within the current text of the Desert Subregional Area and the proposed text of the Draft Borrego Springs Community Plan. The Desert Subregional Area text requires special attention to visual impacts to scenic roadways. In this case S22 is a third priority scenic roadway within the Scenic Highway Element of the San Diego County General Plan. Users of this Highway would be a combination of visitors and residents traveling to and from the remainder of San Diego County and Imperial County. Of these groups, it would be expected that the visitors would be more sensitive to visual impacts than residents who travel the same routes on a continuing basis.

The only place where there is a view of this project from S22 is from that portion of the road known as Montezuma Grade. Along this grade there are several points where views of the valley could take place and one point in particular where there is an overlook with a paved parking area. It is believed that this would be the most sensitive place for visitors coming into Borrego Springs from this direction.

The proposed Draft Borrego Springs Community Plan Text has 3 policies that are relevant to this project. One also deals with protection and enhancement of scenic

highway corridors and has been addressed above. The second one encourages the use of fallowed farmlands for the installation of solar farms for energy production. Since this property is fallowed farmland, it would directly coincide with this policy. The third requires that physical impacts to scenic vistas be minimized so as to not create visual blight or degrade upland landscapes. Scenic vistas have been addressed in Key Views 1-3 which show simulations from the Montezuma Grade Overlook, the State Park Visitor's Center, and Font's Point. The conclusion has been that there will be no significant impact to views from the 3 main vista points.

In addition to the Policies within the current and proposed Draft Borrego Springs Community Plan Text, the viewer responses of the viewer group as defined in the Section 4.2.2 Are described below.

Residential Groups:

This project is located in the agricultural area of Borrego Springs and there are no residences located within the local viewshed as shown on Figure 11. Within the Valley floor, there would be views only in the higher reaches of the alluvial fans, and in these locations the distances, intervening vegetation, lack of height of the structures, and angle of view are such that this project would be barely visible (see Figures 6, 8, 9, 18, 20, 21, 22a, 24, and 25.) Within the remote viewshed there would be very few residences and the views would generally be in excess of 5 miles.

Viewer Groups with a View of the Project from Scenic Highways and Vista Points:

There are two scenic highways in the Desert Subregion. The first is Highway 78 which is a California Official Scenic Highway. This highway runs approximately 10 miles to the south and does not have a view of this project. S22 runs across the Planning area from east to west at Montezuma Grade where there is an overlook having a view of the property. This overlook is 7.18 miles from the property. Once on the valley floor, travelers on S22 would have an extremely limited view of this property. The simulations on Figures 24 and 25 represent the best views of the property once S22 reaches the valley floor and it is clear that visibility into the property is very limited. The visual impacts from the overlook and a simulated view are discussed in Section 5.2.

Recreational Viewer Groups:

This would include viewer groups using the Anza-Borrego State Park Visitor Center, trails within the State Park, and those visiting Font's Point. The State Park Visitor Center is 4.07 miles and Font's Point is 7.5 miles from the project. The visual impacts from these 2 points and simulated in Figures 18 and 19, and are discussed in Section 5.2.

For those groups using trails, there are 2 trails/primitive roads shown on the Anza-Borrego Desert State Park Map that would have a view of this project. One from Lookout Point, some 7 miles from the project on the Montezuma Grade, another

one going to Coyote Canyon. The latter is in the mountains to the north of the valley.

For those groups visiting Font's Point, it is accessible only with a 4 wheeled drive vehicle. The point itself does not have a view of this property, but the parking area, which is at a higher elevation, would have a view. This point is 7.5 miles from the project. The visual impacts from this point and a simulated view are discussed in Section 5.2.

In terms of the different phases of construction, the existing condition of the property and the grading will appear very similar. Upon completion the project will h a dark blue color, which will be adjacent to existing agricultural operations which are dark green and are of various textures. Because of the 7.18 mile distance from this overlook the most sensitive viewers would not be offended by the visual impacts of this project.

Since the project will be consistent with both the current Desert Subregional Text and the proposed Draft Borrego Springs Community Plan, and will not have a negative effect on the viewer described above, the Viewer Response is anticipated to be neutral at best.

## 5.5 Determination of Significance

Determination of Significance is based upon the Guidelines for Significance previously described in Section 5.1.

*1. The project would introduce features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual elements or the quality of the area (such as theme, style, setbacks, density, size, massing, coverage, scale, color, architecture, building materials, etc.) or by being inconsistent with applicable design guidelines.*

The project will not introduce features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual element or the quality of the area.

The existing visual character of the neighborhood is one of vacant properties and agricultural operations. Additionally, there are no sensitive viewers in the immediate vicinity who can see the project because of the level terrain and the extensive system of windrows in this area. In the remote areas of the viewshed, the project will be visible but the distances are so great that the project will appear similar to the adjacent agricultural areas.

An inventory has been done of all buildings within the neighborhood, defined as that area within 1 mile of the outer boundaries of the property, an area of 4,800 acres. Within this area it was determined that there were about 32 structures over 100 square feet in size, of which 4 were residences and 41 were agricultural buildings. There were no commercial or industrial buildings that were not tied to an agricultural

operation. Results of this inventory are shown on Chart 1, Figure 26, and the coded location of these buildings are shown on Figure 27

Theme and Style; The buildings in the neighborhood are mostly limited to agricultural buildings which are usually storage structures for plants, tools and equipment, and other agricultural products. As such they a utilitarian in nature with few architectural features and usually grey or light brown. The structures on this proposal are the panels, which are 5 to 7 feet high and cover a large amount of the area. However, unless an observer is very close, they would appear to be similar to and blend with the agricultural groves to the north and east. However, the shade covers for the inverters would be of a beige color and related more to the buildings in the area. The shade covers are simple rectangular structures that would be similar to the utilitarian agricultural building found in the neighborhood.

Setbacks: The existing agricultural buildings are found in various locations on their properties, but most are found on the interior of the properties, with large setbacks. Chart 1 indicates that the average setback for the inventoried buildings was 616 feet and the median was 436 feet from the centerline of the nearest paved road. For this project, the inverter shades are never closer than 540 feet from the centerline of the frontage road. Thus setbacks would be similar to those found in the other agricultural buildings in the neighborhood.

Density: If fixed arrays are used, there would be about 32 inverter shade screens over an area of 308 acres. This amounts to one 270 square foot structure per 9.62 acres or 1 square foot of building per 1052 square feet of land. If tracker arrays are used, there would be 31 inverter shade screens over an area of 300 acres. This amounts to one 270 square foot structure per 9.9 acres or 1 square foot of building per 1554 square feet of land. In the remaining area there are 104,479 square feet of building covering 4,500 acres, or 1 square foot of building for each 1,876 square feet of land. Although the project is not proposing a density as small as the density that exists on most of the agricultural operations, this is not a density that would detract from the existing character of the neighborhood.

Size: The size of the inverter shade covers is 270 square feet. This is far smaller than most of the buildings in the neighborhood, which average 2,271 square feet.

Massing: The inverters are spread over the entire site evenly and are not agglomerated together. As can be seen on Figure 27, this is much less massing than is found in the neighborhood where agricultural buildings tend to be laid out in groupings.

Coverage: If fixed arrays are used there will be about 32 shade covers on 308 acres, and each having 270 square feet, it will amount to .065% of the site covered. If tracker arrays are used there will be 31 shade covers on 308 acres and it will amount to .062% of the site covered. The panels will cover much more of the site, but with a height of 5-7 feet will not appear as buildings unless one is very close and would more resemble vegetables or groves of small trees. In terms of the rest of the “immediate vicinity”, there is a coverage of 104,479 square feet over 4,500 acres. This amounts to .053% of

the “immediate area covered”. Again, the proposed coverage more than currently exists, but the coverage of .095% or .062% is too small to detract from the existing character of the neighborhood.

Scale: The size of the shade covers will be much smaller than all but 4 of the buildings in the neighborhood inventoried. The average size of the buildings in this area is 2,271 square feet, with the median size being 1,246 as opposed to the 270 square feet sun shades.

Color/Architecture: The color of the inverters will be a light brown and will be rectangular in shape. Most of the buildings in the area are grey or light, earth tone colors, so there inverters will not stand out. Also most of the buildings in the area are very plain in design, which would be consistent with the inverters proposed.

The project will be laid out with modules on a series of racks and a number of inverters. The modules will be 5-7 feet in height depending upon whether they will be designed to follow the sun, and the inverters will be 9 by 30 feet and have shades about 10 feet high and a square footage of 270 feet. The areas in the higher elevations where the project will be come visible are generally 4-7 miles from the project. From this distance the individual modules will not be discernible and together, because of their dark color, will appear similar to the agricultural uses in the area. There are inverters spread over 308 acres whose size and bulk will be less than most buildings in Borrego Springs. Thus the scale, bulk and coverage in terms of visual impacts will not be an issue.

The property is generally level and only limited grading required

The property is presently vacant with remnants of the previous agricultural activity. The site is presently covered with dead or dormant grasses with some stakes and other features of the previous agriculture.

In addition, only 4 single family homes are located closer than a mile from this property

Thus impacts would be less than significant.

*2. The project would result in the removal or substantial adverse change of one or more features that contribute to the valued visual character or image of the neighborhood, community, or localized area, including but not limited to landmarks (designated), historic resources, trees, and rock outcroppings.*

The property is currently an abandoned agricultural operation with remnants of hardware and dead plants. This landscape is not consistent with either the agriculture in the area, or the natural desert vegetation. Additionally, it would not be considered a feature of the landscape that would contribute to the valued visual character or image of the neighborhood, community, or localized area. No landmarks, historic resources, trees or rock outcroppings will be removed as a result of this project. What will replace the abandoned agriculture will be solar panels which

are dark blue, and will be more attractive from the immediate vicinity and blend with the agriculture from viewpoints further removed, but with more viewers.

Thus impacts would be less than significant.

*3. The project would substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from:*

- *a public road,*
- *a trail within an adopted County or State trail system,*
- *a scenic vista or highway, or*
- *a recreational area.*

There are no public roads, other than S22 discussed below, which would have a valued vista substantially obstructed, interrupted or detracted from. No other roads would have visibility into this project except Borrego Valley Road, which has no known valued vista.

The California Sign Route Designation has criteria for numbered County Highways that are (1) County routes of major importance that are of general public interest, (2) County routes that are constructed to sufficient standards to guarantee safe passage to the motorist, and (3) County routes that have a logical beginning and logical terminus without reference to city, County, or State Boundaries. There are three sign routes in the Borrego Valley. One of these routes, SR78, does not have a view of this project. Another route, S3 has a very distant and limited view of the property (See Figure 23, Key View 7, and one that would not "substantially obstruct, interrupt, or detract from a valued focal or panoramic Vista. The third route is S22 which is discussed later as a scenic highway.

There are three trails in the area which are planned to be a part of the County Regional Trail System: portions of the Juan Bautista de Anza Historic Trail in the northern portion of the valley, portions of the California Riding and Hiking Trail in the western portion of the Desert Subregional Planning Area and the Trans-County Trail which runs east to west through the center of the valley. Portions of the first 2 trails would have a view of the project in their higher elevations, but both views would be 4-6 miles from this project and at a low angle. Additionally the intervening existing agriculture would tend to hide the views of the project because of the low height of the panels (5 to 7 feet) as compared to the mature orange trees (20 to 25 feet in height). Finally, where the project could be seen, it would blend with the agriculture already existing and would not substantially obstruct, interrupt, or detract from a valued panoramic vista.

A third priority scenic highway (S22) runs through the valley. Portions of the higher elevations as it enters the valley from the west would have a view of this property and one of these has been the subject of a simulation (See Figure 17). As can be seen, the distances are so great from this point that the project will be barely detectable and will blend with the surrounding agricultural operations. As such the project would

appear to be very small and would not substantially obstruct, interrupt, or detract from a valued panoramic vista.

Font's Point is a recreational area that has views of this project from the parking area from a distance of 7.5 miles. This view has been subject to a simulation (See Figure 19) and from this simulation it can be seen that from this distance that the project will be barely detectable and will blend with the surrounding agricultural operations. As such the project would appear to be very small and would not substantially obstruct, interrupt, or detract from a valued panoramic vista.

Thus impacts would be less than significant.

*4. The project would not comply with applicable goals, policies or requirements of an applicable County Community Plan, Subregional Plan, or Historical Zoning."*

There is no historical zoning near this property.

There are 2 parts of the current San Diego County General Plan and one part of the proposed General Plan Update which address the State Park, Scenic Highways, and scenic vistas.

The Recreation Element, Part IV of the San Diego County General Plan Under "State Parks" states

"Any proposal for private development will be reviewed to assure that there will be a minimum of adverse affect on the State park"

The Desert Subregional Plan, Part XXI under subject 10 Policy 1, States that

"1. Any actions affecting land use within scenic highway corridors should emphasize the protection and enhancement of scenic resources."

The proposed Draft Borrego Springs Community Plan as recommended for approval by the Planning Commission on April 16, 2010, States

> Policy LU-3.16.1 Any actions affecting land use within scenic highway corridors should emphasize the protection and enhancement of scenic resources."
>
> "Policy-COS 1.3.1 Require that physical impacts to the scenic vistas within the Plan area be minimized to a level that does not create visual blight or degrade upland landscapes."

In addition, The proposed Draft Borrego Springs Community Plan as recommended for approval by the Planning Commission on April 16, 2010, also states

> "Policy LU 4.5.2 Encourage the use of existing fallowed farmlands for the installation of solar farms for energy production."

These policies have been previously analyzed. The project does not conform to the latter draft policies of the Draft Borrego Springs Community Plan because that plan has not yet been adopted. However, if those policies are adopted by the Board of Supervisors, estimated to be in February of 2011, this project would be consistent with both draft policies, because (1) the project will blend with current land uses and not detract from the scenic vistas of the Scenic Highway (S22), and (2) the project would be utilizing existing fallowed farmlands for energy production.

Thus the project would be consistent with the Scenic Highway Element, the existing Borrego Springs Community Plan, and the Draft Borrego Springs Community Plan when it is adopted. Thus impacts would be less than significant.

*Glare:*

The project will install reflective building materials, including but not limited to glass and surfaces, that could create daytime glare and be visible from roadways, pedestrian walkways or areas frequently used for outdoor activities on adjacent properties.

As mentioned previously, PV solar panels are designed to absorb as much light as possible to maximize their efficiency in converting sunlight to electricity. However, because PV panels are covered with glass, they have the ability to create glare from the panels under certain conditions. Glare is the common term often given to specular reflections from smooth surfaces and occur from common objects such as building windows, water surfaces, and car windows/bodies.

In order to maximize light adsorption, generally the reflectivity levels of solar panels are much lower than standard glass. The amount of sunlight that is reflected from PV panels varies somewhat by the incident angle of the sun, the type of panel, and the manufacturer but has been measured to range from 5 to 20 percent.

For any of this reflected light to be seen as glare, a viewer has to be located at an angle from the reflective surface equal to the angle from which the sun is striking the surface. Therefore, to see glare from a PV panel requires specific locations of the viewer and the sun relative to the angle at which the PV panel is mounted. As the angle of the sun changes during the course of a day and over the course of the year, the locations from which glare could be seen varies and is of short duration.

Because of the angles required to see reflections, is not possible to see glare from many locations surrounding a PV solar project. For example, if the panels are fix-mounted (facing up towards the southern sky), viewers on the north (and northeast and northwest) would not experience glare because they would have no view of the reflective surface of the panels. Viewers south of the PV project would also not experience glare because when the sun is at a directional angle that could be reflected in that direction, it is high in the sky and any reflected light would likewise be reflected upwards. Therefore, glare could only be seen by viewers southwest or southeast of the project with unobstructed views of the Project – those southwest

could see glare only when the sun is low in sky in the early morning and those southeast could see glare only when the sun is low in sky in the late evening.

If the panels were mounted on single-axis trackers, they would be mounted horizontally (flat) in north-south rows and track the sun east to west during the course of the day. Because the sun is always in the southern sky in this hemisphere, no light or glare could be reflected south, east, or west of the project site. Similar to any other flat surface, light could be reflected to the north from a southern light source (the sun). Locations that could see glare north of the project would change constantly as both the angle of the sun and the angle of the panels change over the course of a day. Generally glare from single-axis trackers could not be seen from locations on the ground except in the early morning or late evening when the sun is very low in the sky.

In any case, the specific locations on the ground that could experience glare would change over the course of the year as the angle of the sun changes with the seasons. Therefore, glare could be seen from a PV panel from a specific location for only short durations in any given day as the sun tracks across the sky and at constantly differing locations over the course of the year.

Therefore the proposed project will not be installing highly reflective building materials that would result in a substantial increase in light and glare that would affect the surrounding area, including surrounding houses and public viewpoints. The PV panels would not produce reflective light that would create adverse disability or discomfort glare. In addition, the panels will have a non-reflective coating to further minimize the potential for glare sot there would be a minimal amount of viewing reflection that would be minimized by AR (antireflective) panels. The proposed project is in accordance with the County Guidelines of Determining Significance for Lighting and Glare. The reduced reflectivity of the PV solar panels with an antireflective coating would not adversely affect day or nighttime views in the area. The slight increase in glare from the project would be a less than significant impact.

Conclusion:

The conclusion is that the project is consistent with the Guidelines of Significance for the following reasons.

1. This project proposes relatively small structures, the vast majority of which will be dark blue in color so as to blend with the adjacent agriculture. Additionally, there are no sensitive viewers in the immediate vicinity who can see the project because of the level terrain and the extensive system of windrows in this area. In the remote areas of the viewshed, the project will be visible but the distances are so great that the project will appear similar to the adjacent agricultural areas.

2. The property is currently an abandoned agricultural operation with remnants of hardware and dead plants. Any removal of these items would only result in a positive visual impact

3. There are no public roads which would have a valued vista substantially obstructed, interrupted or detracted from except for S22. Portions of this highway, in the higher elevations as it enters the valley from the west would have a view of this property, but distances are so great from this point that the project will be barely detectable and will blend with the surrounding agricultural operations. As such the project would appear to be very small and would not substantially obstruct, interrupt, or detract from a valued panoramic vista.

In addition, there are three trails in the area which are planned to be a part of the County Regional Trail System. Portions of the first 2 trails would have a view of the project in their higher elevations, but both views would be 4-6 miles from this project.

As such the project would appear to be very small and would not substantially obstruct, interrupt, or detract from a valued panoramic vista.

Font's Point is a recreational area that has views of this project from the parking area. The distance from this location is so great that the project will be barely detectable and will blend with the surrounding agricultural operations. As such the project would appear to be very small and would not substantially obstruct, interrupt, or detract from a valued panoramic vista.

4. This proposal has been reviewed with those parts of the Anza-Borrego State Park that are most utilized to determine if there would be any adverse visual effects and the conclusion was that there would not be any adverse visual effects. Only the higher elevations of the State Park would have a view, and those areas would be sparsely used or so far from the project that it would not have and adverse visual effect.

Due to the distances involved and the fact that this project would blend with the agriculture in the area, the scenic attributes of S22 would continue to be protected.

Because of the angles required to see reflections, is not possible to see glare from many locations surrounding a PV solar project. Because the sun is always in the southern sky in this hemisphere, no light or glare could be reflected south, east, or west. Locations that could see glare north of the project would change constantly as both the angle of the sun and the angle of the panels change over the course of a day. Because the duration is short and the only unobstructed views are miles away, impacts from glare are not expected to be significant. The Project would not affect nighttime views of the area because no lights are planned for installation in the solar field.

## 5.6 Cumulative Impact Analysis

The boundary of the cumulative impact analysis will be the area roughly encircled by the remote viewshed. This is an extensive area covering the majority of the valley and represents all areas having a view of the property. As can be seen in Figure 11, the remote viewshed does not completely form a circle. Thus it was necessary to connect

areas trying to keep the general form established by the shape of the viewshed. The cumulative boundaries are shown on Figure 29 and cover an area of about 62,680 acres.

Figure 28 is a listing of the 23 projects that have current or pending approvals during the last five years. These projects are located on Figure 29.

Construction of currently approved and pending projects in the cumulative study area would permanently alter the nature and appearance of the area as future development occurs over the coming years. Gradual buildout of the projects considered in this analysis would result in a change in the existing conditions over time, however, the change would not result in a significant impact as it would not substantially alter the overall visual landscape of the desert.

It is anticipated that future construction activities within the cumulative study area would occur on various sites and at varied times, when an application for development is made. Such construction related impacts would be short-term and would cease upon completion. In addition, all new development projects within the cumulative study area would be subject to additional environmental and design review on a site specific project by project basis to ensure visual aesthetic impacts are limited to the extent possible during the construction process. All future construction activities would be required to be consistent with the County's regulatory requirements and applicable conditions of approval to reduce potential cumulative effects of construction to less than significant

In addition, future development of the cumulative projects in the project vicinity could permanently convert existing off-site open space or undeveloped lands to developed lands, potentially resulting in the incremental loss of visible open space within the Borrego Springs Community. Such future development could also contribute to the alteration of views to designated visual resources. All future development within the Borrego Springs Community would be subject to an evaluation of the significance of potential cumulative visual and aesthetic changes on a site-specific, project by project basis, with consideration for its scope and contribution to a change in the overall visual pattern of character within the community.

The cumulative projects considered for the Cumulative Analysis are located throughout the Borrego Springs Area. All but 4 of the 23 projects are residential subdivisions. These additional planned residential uses represent a continuation of the existing development pattern in Borrego Springs. The four non-residential projects include two proposed solar plants and their transmission lines that will be discussed later in this section. The others include an agricultural clearing permit and an over-height security fence for the SDG&E Substation.

The two formal applications that have been made to the County for solar energy projects include this project and the Eurus Energy Borrego Land LLC project. The location of this facility is shown in relation to the project on Figure 30. It is located on 341 acres adjacent to and north of the Borrego Valley Airport and approximately 1 mile east of Borrego Valley Road. A Notice of Intent to Adopt a

Mitigated Negative Declaration was filed on this project on June 24, 2010 and the public review period ended on July 23, 2010. It was approved by the Planning Commission on October 8, 2010. The decision of the Planning Commission was appealed to the Board of Supervisors, which heard the appeal on January 12, 2011. On that date, the Board of Supervisors, with an amendment, took action to approve the Planning Commission Recommendation thereby approving the project. This project would use solar panels that would also be a maximum of 10 feet in height and would generate 35-40 MV.

The Eurus project would be approximately 1.55 Miles from the subject property at the nearest point of each project. Because of the limited height for the panels for both projects, they could only both be seen from the higher elevations. In reviewing the "present" photo of Figure 30 it can be seen that while these projects would contrast with the natural desert floor, they would look similar to the existing agricultural operations and the resorts.

(2) The other project is the Avalon Borrego Solar Project (3300-10-030), located approximately .8 miles to the northwest of the project site along Di Giorgio Road. This project is proposing a 19.24 acre 2.5 MW solar farm with towers varying in height from 25 to 55 feet depending upon the time of day.

These projects combined are 360 acres. The valley floor of the Cumulative Viewshed Area is approximately 46,811 acres and can be seen on Figure 29 as the area within the light blue line, but not including the area shaded orange. Thus the two projects occupy .77% of the valley floor. If the present project is included, the three projects occupy 688 acres or 1.43% of the desert floor.

Figure 30 is a panorama taken from Montezuma Grade Overlook (not the same photo as the one used in the simulation from this point) which shows the location of both projects and also the other developments in the valley visible from this overlook.

The Borrego Springs Area offers a desert environment with abundant sunshine, combined with available undeveloped lands that are generally flat, the area represents optimal conditions for locating solar energy facilities in the future. If proposed, it is anticipated that any future installation of solar panels along the valley floor would occur sporadically on available parcels as independent development applications, rather than concentrated in one large area of the valley. Thus, the cumulative visual effect of such installations would be reduced as a range of small scale to larger scale project would likely be proposed, depending on available land, proper zoning, and the nature of the applicant.

In addition, as evaluated for the proposed project, potential glare impacts on a cumulative level as the result of additional solar energy facilities locating within the Borrego Valley would be less that significant. As all solar panels are designed to absorb sunlight, potential glare effects from future additional solar installations would not create significant glare or reflective surfaces that would create adverse effects on surrounding land uses or on views from surrounding vantage points.

Future solar installations along the valley floor would have a similar visual effect as other types of development would have in that they would generally change undeveloped land to developed land. Over time, it is anticipated that development within the Borrego Valley will continue to occur. As the valley floor is extensive, and the proposed project site represents a minimal overall percentage of such lands, the proposed development is not expected to result in a significant visual change in the appearance of the valley floor when viewed from higher elevations. In addition, due to the limited height and scale of the proposed project elements, the project is not anticipated to contribute to a significant cumulative impact on existing views from locations within the valley, as such views would be restricted by relatively flat topography, and intervening development and vegetation.

Assuming a complete buildout of all the projects considered for the cumulative analysis, potential aesthetic cumulative impacts are considered to be less than significant for the following reasons:

The projects would not result in the introduction of features that would detract or contrast with the existing visual features of the surrounding area. The existing development in the Borrego Valley consists of a range of uses that include high end desert resorts, mobile home parks, agricultural uses, commercial uses, and single family residential uses. The inclusion of the three solar projects (including the proposed project) in the land use mix would not conflict with the visual quality of the area because the solar projects are spread out, not concentrated in one area, would cover only 1.43% of the valley floor, and would not result in an incremental visual impact on the cumulative viewshed. In addition, as discussed below, any future projects would also need to do an analysis in terms of cumulative impact.

These projects would not disrupt the pattern of development adjacent to existing homes or businesses, and would not conflict with specific design guidelines or specific thematic development requirements to the area.

The addition of the cumulative projects would not remove or create a substantial adverse change to the features that represent a valued visual resource in the area.

The Valley floor would still be visible from higher elevations and would still appear to have a scattered development pattern once the cumulative projects are constructed. None of the projects would alter the mountain views from the valley floor from places where they are currently observed. The cumulative projects would not remove or replace any local of State designated landmarks.

The proposed project would not substantially obstruct or detract from valued lookouts or panoramic views from public roads, scenic highways, or recreational areas. Buildout of the cumulative projects would not have an adverse effect of these public viewsheds because the projects would match the existing development pattern in the Borrego Valley. As noted previously, most of the cumulative projects are residential projects or modifications to existing developments. From a vantage point where all of

the development would be visible, it would appear to be the continuation of the existing development pattern in the area. In order to see all three proposed solar projects, the viewpoint would have to be located at a higher elevation than the valley floor and would be several miles away from any one of the proposed solar projects. Because of the distance between the solar projects and the distance from the public viewpoint, the cumulative visual effect of the solar projects would not substantially obstruct views from scenic vistas or public roads.

Moreover, the cumulative projects would be required to comply with applicable goals and policies of the County General Plan, Desert Subregional Plan, and the County Zoning Ordinance. Only one project, project # 18 would propose to change the existing County General Plan and Zone. Specific analysis to show compatibility of this project would be required prior to approval of the project.

In addition, all lighting proposed with future development within the cumulative study area, such as street lighting, security lighting, or exterior illumination, would potentially result in increased light and glare impacts within Borrego Springs. Projects within the cumulative study area would be evaluated by the County and the Borrego Springs Community Sponsor Group on a project by project basis to determine the extent of such lighting necessary and any appropriate site specific measure to reduce potential impacts on surrounding areas. Lighting for these projects will be limited and will need to comply with County Ordinances. As such, it is anticipated that the cumulative effects of increased lighting and or glare associated with future development in the cumulative study area would be reduced to less than significant levels. As the project would require minimal lighting for the purposes of security and maintenance, the project would not contribute to significant cumulative impacts relative to light and glare. Impacts in this regard would be less than significant.

All future development within the Borrego Springs would be subject to an evaluation of the significance of potential cumulative visual and aesthetic changes on a site-specific, project by project basis, with consideration for its scope and contribution to a change in the overall visual pattern or character within the community. Adherence to applicable General Plan policies and goals and applicable County Design Standards would further reduce potential cumulative impacts relative to the long-term alteration of views to designated scenic resources. Although the project would result in a permanent visual change in the existing landscape with development of the proposed solar farm, as demonstrated by evaluation of the visual simulations prepared, the project is not considered to contribute to a significant cumulative effect with regard to the loss of views to scenic resources.

There will not be a significant adverse direct and/or indirect impact on the visual environment.

## 5.7 Summary of Project Impacts and Significance Conclusions

Impacts from the Valley Floor:

There will be very limited visual impacts occurring on the valley floor and these would not constitute a significant impact for the following reasons:

1. The valley floor and this project are generally level, meaning views into the property are easily obstructed by even lower height vegetation.

2. The height of the structures will be a maximum of 10 feet also making them easily obstructed by even lower height vegetation.

3. There are agricultural operations taking place adjacent to the property both to the north and east which will obstruct views from those directions.

4. There is an extensive system of windrows which have developed over time in the valley. These rows of vegetation have generally been planted to protect the agricultural areas from wind erosion, but they also serve to block views of the Project.

5. Views from a public road are limited to approximately .75 miles on Borrego Valley Road and approximately .16 miles on Di Giorgio Road. Both of these roads are lightly traveled and the duration of the views are short term.

6. There are very limited views from S22 (on the valley floor), the third priority scenic highway per the Scenic Highway Element.

7. There are no views from SR78, which is an Officially Designated Scenic Highway by the State of California.

8. In applying the Guidelines for Significance, as stated in the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements—Visual Resources prepared by the San Diego County Department of Planning and Land Use, it was found that the project would not have a significant impact to visual resources.

9. The project will be consistent with the proposed Draft Borrego Springs Community Plan which, in Policy LU 4.5.2, encourages the use of existing fallowed farmlands for the installation of solar farms for energy production, upon its adoption.

Impacts from the Higher Elevations:

There will be greater visibility from the higher elevations because the views would be less obstructed, however these would not constitute a significant impact for the following reasons:

1. There would be no views from residences.

2. Views would be of short duration. For autos, passengers would stop their vehicle, take in the view, and proceed. Most views would be 5-10 minutes.

3. For trail users, this would involve a limited population and a limited period of time using the trails. In addition, this project would not obstruct any views from trails.

4. All points at higher elevations are considerable distances from the project. At these distances the project would be similar to the agricultural uses occurring in the valley.

5. The project is near and adjacent to the major agricultural areas in the northern part of the valley. At the distances involved, it would tend to blend in with the agricultural operations.

6. With the exception of the overlook on Highway S22, the primary purpose of those visiting viewpoints is not to enjoy the view of the valley. At Font's Point the primary purpose is to view the Borrego Badlands, on Coyote Trail, the primary purpose it to visit Desert Gardens, and at the Visitor's Center the primary purpose is to view the attractions inside.

7. Views from the third priority scenic highway, S22 would not be impacted because of points 2, 4, and 5 above.

8. This project will not obstruct or obscure any views of the valley.

9. In applying the Guidelines for Significance, as stated in the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements—Visual Resources prepared by the San Diego County Department of Planning and Land Use, it was found that the project would not have a significant impact to visual resources.

10. The project is consistent with the proposed Draft Borrego Springs Community Plan which, in Policy LU 4.5.2, encourages the use of existing fallowed farmlands for the installation of solar farms for energy production.

11. Glare could not be seen from most locations around the Project. At locations where glare from the panels could be seen, the duration would be very short at a specific location on a given day (as the sun moves across the sky) and the locations from which it could be seen would change over the course of the year (as the angle of the sun in the sky changes seasonally).

Thus their will not be significant impacts from either the valley floor or higher elevations.

# 6.0 VISUAL MITIGATION AND DESIGN CONSIDERATONS

The design considerations will be that the solar panels have an antireflective coating to reduce glare. Other than that consideration, since the project will not have significant impacts to visual resources from either the valley floor or the higher elevations, there are no other mitigation and design considerations proposed,

# 7.0 REFERENCES


Written Works:

Bureau of Land Management, Visual Resources Inventory and

Analysis. California Streets and Highway Code, Sections 260-283

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